

December 1, 2011

Marlene H. Dortch 445 12th Street, S.W. Room TW-A325 Washington, D.C. 20554

Re: Vonage's Petition for Limited Waiver, CC Docket No. 99-200

Dear Ms. Dortch:

On November 28, 2011, Marc Lefar, Chief Executive Officer of Vonage Holdings Corp., had a teleconference with Josh Gottheimer, Senior Counselor to Chairman Genachowski. During this conversation, Mr. Lefar discussed Vonage's pending request for a waiver to allow Vonage direct access to telephone numbers and reasons why the Commission should grant the waiver.

In particular, granting Vonage direct access to telephone numbers would promote the public interest by enabling Vonage to provide new and advanced services to consumers, facilitating the deployment of IP networks, delivering lower prices and increased value to VoIP consumers, and improving Vonage's number porting process.

Mr. Lefar also discussed how granting Vonage's requested waiver is consistent with the waiver granted to SBC Internet Services ("SBCIS") in 2005. Mr. Lefar indicated that, in addition to the conditions imposed on SBCIS, Vonage is willing to undertake additional conditions to further promote the public interest.

Finally, Mr. Lefar explained that granting Vonage's requested waiver is supported by the fact that while Vonage does not currently have numbering rights, significant numbering obligations have been imposed on Vonage, including supporting number porting and contributing to the costs of numbering administration.

If you have any questions or need additional information, please contact me at (732) 444-2216.

Sincerely,

Bundan Kanper Brendan Kasper

CC: Josh Gottheimer

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